# FILED U. S. DISTRICT COURT EASTERN DISTRICT OF TEXAS

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#### IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHAL DIVISION

DAVID MALAND,	CLERK
Ву	
Deputy	

9 2004

(1) (2) VS.	BBG COMMUNICATIONS, INC. BBG HOLDINGS LIMITED	\$ \$ \$ \$ \$ \$	Civil Case No. 2:03-CV-227 (WARD)
(1) INTER (2) (3) (4) (5)	NETWORK COMMUNICATIONS RNATIONAL CORP.; BLUE PHONE LIMITED; WILLIAM POPE; JAY WALTERS; and JEFFREY WALTERS	\$\phi \phi \phi \phi \phi \phi \phi \phi	

## <u>DECLARATION OF GREGORIO GALICOT IN SUPPORT OF</u> <u>ATTORNEYS-EYES-ONLY DESIGNATIONS</u>

- I, Gregorio Galicot, declare:
- 1. I am the President of BBG Communications, Inc. ("BBG"), the plaintiff in this action. I have personal knowledge of the facts stated herein and, if sworn as a witness, could and would testify competently thereto.
- 2. I have been personally involved in part of the document production process in this litigation. Subsequent to the hearing on June 24, 2004, I spent many hours over two days personally reviewing the vast majority of the documents that have been designated by BBG as Attorneys-Eyes-Only ("AEO") in this action. One of the purposes of that review was to undesignate as many AEO documents as possible without allowing Network Communications International Corp. ("NCIC") to gain access to BBG's most sensitive and confidential

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competitive information, especially in light of the known prior conduct of NCIC in wrongfully obtaining BBG's confidential information and affirmatively using it to compete with and damage BBG.

- 3. One result of my most recent review of the AEO documents produced by BBG is that BBG is allowing many additional pages of documents to be undesignated as AEO, even though they meet the criteria for AEO documents set forth in the protective order. Thus, since June 3, 2004, BBG has undesignated all of the documents listed on the Log of Undesignated AEO Documents attached hereto as Exhibit A, which documents exceed 1000 pages. In addition, BBG has undesignated in excess of 225 pages, or portions of pages, as noted in bold on the Log of AEO Documents attached hereto as Exhibit B. For example, the document listed on page 60 of Exhibit B with Bates numbers 12237\_1 through 12237\_637 is being partially undesignated, such that only one page out of a total of 637 pages remains AEO. All of these undesignations are in addition to others made before June 3, 2004.
- 4. The information that BBG is keeping designated as AEO is BBG's most sensitive and confidential information. There are specific uses to which NCIC could and, given its past conduct, would put this remaining AEO information if given the opportunity.
- 5. The documents listed on the Log of AEO Documents, which is Exhibit B, all fall within the definition in the protective order for AEO documents, namely that they are either trade secrets, unpublished financial information, customer sales information, profit information or marketing data and strategies of BBG. Examples of the categories into which various AEO documents fall are discussed below. Selected examples are also discussed below after the general categories. However, even if a particular document is not discussed among the examples below, it still falls within the definition as being entitled to AEO protection.

6. Many of the AEO documents are actual contracts with customers. They need to retain AEO protection because they contain very sensitive and specific sales information about specific customers, including trade secrets. Knowing the specific details of these specific contracts with customers would allow NCIC to unfairly compete and interfere with these contracts. Customer contracts that need continued AEO protection (for all or part of the document as indicated on the Log of AEO Documents) include, but are not limited to, documents within the range of the following Bates numbers:

BBG 000568-000583	BBG 10961-11342	BBG 11895-11946
BBG 002680-002692	BBG 11354-11485	BBG 12172-12182
BBG 004145-004161	BBG 11520-11631	BBG 12240-12246
BBG 06593-06595	BBG 11634-11704	BBG 12247-12286
BBG 06659-06667	BBG 11705-11714	BBG 12302-12316
BBG 10100-10111	BBG 11715-11822	BBG 12507-12557
BBG 10507-10527	BBG 11832-11839	BBG 12580-12587
BBG 10530-10627	BBG 11854-11864	
BBG 10643-10734	BBG 11865-11879	

7. Many of the AEO documents contain undisclosed and highly confidential marketing and business strategy information, including trade secrets. This information needs to retain AEO protection as it would allow NCIC to compete unfairly with BBG if NCIC had access to it. These types of documents that need continued AEO protection (for all or part of the document as indicated on the Log of AEO Documents) include, but are not limited to, documents within the range of the following Bates numbers:

BBG 000003-000007	BBG 003645	BBG 06642
BBG 000028	BBG 003646	BBG 06671-06672
BBG 000197	BBG 003647	BBG 06775-06782
BBG 000201-000202	BBG 003648-003649	BBG 07434-07435
BBG 000496	BBG 003650-003651	BBG 07549-07557
BBG 002254-002256	BBG 003652-003654	BBG 07603-07610
BBG 002261-002269	BBG 003656	BBG 10112-10126
BBG 002319-002324	BBG 003659-003660	BBG 12016
BBG 002327-002328	BBG 003661	BBG 12194
BBG 002593-002596	BBG 003662-003663	BBG 12287-12301
BBG 003632	BBG 003664-003673	BBG 12317-12337
BBG 003633-003634	BBG 003677-003680	BBG 12348-12349
BBG 003636-003638	BBG 04782-04811	BBG 12500-12501
BBG 003639	BBG 04818-04826	BBG 12574-12578
BBG 003640-003641	BBG 04838-04843	
BBG 003642-003644	BBG 04854	

8. Many of the AEO documents contain highly confidential and unpublished internal financial information of BBG. These types of documents that need continued AEO protection (for all or part of the document as indicated on the Log of AEO Documents) include, but are not limited to, documents within the range of the following Bates numbers:

BBG 000182

BBG 000321

BBG 000414-000483

BBG 000596-000597

BBG 002261-002269

BBG 012588-012590

9. Many of the AEO documents contain or are customer lists, or contain confidential information about specific customers, such as contact information, call volumes, confidential numbers related to processing calls, or information that would allow NCIC to determine the identity of or contacts for specific customers such as originating numbers of the call traffic.

These types of documents that need continued AEO protection (for all or part of the document as indicated on the Log of AEO Documents) include, but are not limited to, documents within the range of the following Bates numbers:

BBG 000003-000007	BBG 000523-000527	BBG 004844
BBG 000028	BBG 000528	BBG 004957-004963
BBG 000236	BBG 000538-000558	BBG 005366-006121
BBG 000238	BBG 000599-000630	BBG 006123-006165
BBG 000244-000250	BBG 000746-000747	BBG 07309.001-
BBG 000323-000324	BBG 002261-002269	007309.899
BBG 000360-000364	BBG 002271-002313	BBG 007309.900-
BBG 000367-000370	BBG 002665-002672	007309.904
BBG 000371	BBG 002676-002678	BBG 007309.916-
BBG 000374-000377	BBG 002819-002820	007309.925
BBG 000378	BBG 002840-002872	BBG 10097
BBG 000394	BBG 002874-002883	BBG 12030
BBG 000487-000488	BBG 002917-002921	BBG 12089-12090
BBG 000490	BBG 003657-003658	BBG 12574-12578
BBG 000496	BBG 003891-003892	BBG 12588-12590
BBG 000512-000514	BBG 003893	BBG 12591-13016
BBG 000519-000521	BBG 003897-003898	

10. In addition to falling within one or more of the general descriptions above, some AEO documents require particular discussion as follows:

- 10.1 The document with Bates numbers BBG 000003-000007 contains highly confidential customer sales information, including but not limited to names of hotels, locations, numbers of rooms, and contract status.
- 10.2 The documents with Bates numbers BBG 000028, 000236, and 000238 include a list of hotels and specific hotel properties indicating which agents manage which hotel properties and regions.
- The document with Bates number BBG 000197 shows specific commission rates.
- 10.4 The document with Bates numbers BBG 000201-000202 contains marketing data and strategies including specific contact names.
- 10.5 The document with Bates numbers BBG 000244-000250 contains specific customer sales information including a list of hotels and other customers with volume of calls from specific customers to show which properties are most profitable.
- 10.6 The documents with Bates numbers BBG 000323-000324 contain specific information about a particular deal with a third party on managing hotel properties with all of the financial and property information included.
- 10.7 The document with Bates numbers BBG 000360-000378 include total calls per hotel, the amount of money paid, and the current evaluation of each property listed.
- 10.8 The document with Bates number BBG 000394 includes call volumes and other customer information for a specific property.
- 10.9 The document with Bates numbers BBG 000414-000483 is a billing and collection agreement with a third party which contains unpublished financial information, specific negotiated terms, and the costs charged by the third party.

- 10.10 The document with Bates numbers BBG 000487-000488 has specific contacts at specific hotels listed.
- 10.11 The document with Bates number BBG 000490 is a list of customers with their specific toll free numbers.
- 10.12 The documents with Bates numbers BBG 000496 and 000528 include total numbers of one particular country, including the amount of money paid and the amount of call traffic with this phone company. It also includes the costs per call.
- 10.13 The documents with Bates numbers BBG 000512-000514 and BBG 000523-000527 show client names, addresses, how BBG is installed with that particular client, and the current contractual status.
- 10.14 The document with Bates numbers BBG 000519-000521 shows specific call details, including the total amount of calls for a specific property for certain months.
- 10.15 The documents with Bates numbers BBG 000538-000558 and BBG 0002271-002313 are confidential to both BBG and the hotel chain listed. They include specific email contacts with this specific customer chain, and which agents handle which regions and their hotel contacts and contact information. It is highly sensitive customer contact data and marketing strategy data.
- 10.16 The document with Bates numbers BBG 000588-000591 gives details of negotiations over contract terms with a customer.
- 10.17 The document with Bates numbers BBG 000596 and 000597 contains unpublished financial information of BBG.
- 10.18 The document with Bates numbers BBG 000590-000630 is extremely sensitive customer information with specific profit information and marketing data. It indicates

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how many calls are made for the particular property and other profit information. Although the document does not indicate the particular property, surrounding documents produced by BBG may allow that determination.

- 10.19 The documents with Bates numbers BBG 000655-000656 involve customer sales information in that they involve specific negotiations with a specific customer.
- 10.20 The document with Bates numbers BBG 000853-001261 is unpublished financial information of BBG. The pages with Bates numbers BBG 001258-001261 show BBG's business practices and strategies. The undisclosed summary financial information on pages BBG 000853-000859 is particularly sensitive.
- 10.21 The document with Bates number BBG 002231 has confidential customer sales and profit information.
- 10.22 The document with Bates numbers BBG 002239-002251 is a contract with a phone company that includes customer sales and marketing data, unpublished financial information and trade secrets.
- 10.23 The document with Bates numbers BBG 002254-002256 contains marketing data and strategies.
- 10.24 The document with Bates numbers BBG 002261-002269 contains unpublished financial information, profit information and marketing data.
- 10.25 The document with Bates numbers BBG 002317-002318 contains unpublished financial information.
- 10.26 The document with Bates numbers BBG 002319-002324 contains toll free numbers and ANI numbers which would allow NCIC to determine BBG's marketing strategies.

These are not public toll free numbers. The number of calls per country would show how active BBG is in a particular country so as to determine how profitable various markets are.

- 10.27 The document with Bates numbers BBG 002327-002328 contains marketing materials and was part of a private customer presentation.
- However, BBG has kept as AEO the information related to commissions paid to agents as this constitutes trade secret information and reveals marketing data and strategies. In addition, NCIC has in the past approached BBG's agents with specific monetary proposals to work as NCIC agents. Pages that have been kept AEO based on this reason include but are not necessarily limited to BBG 000197, BBG 004097, BBG 004113, BBG 004128, BBG 004136, BBG 004175, BBG 004190, BBG 004202, BBG 004221, BBG 004236, BBG 004339, BBG 004356, BBG 004372, BBG 004373, BBG 004387, BBG 004403, BBG 004417, BBG 004444, and BBG 006669.
- 10.29 The document with Bates numbers BBG 004419-004431 is completely unrelated to the case and also contains customer and sales information.
- 10.30 The document pages with Bates numbers BBG 07309.900-07309.904 contain customer sales and profit information such as call volumes and rates. The same is true for the document pages with Bates numbers BBG 07309.916-07309.925.
- 10.31 The document with Bates numbers BBG 10100-10111 is a customer contract with sales information rates included.
- 10.32 The document with Bates numbers BBG 10112-10126 contains business and marketing strategy information.

10.33 The page of a partially undesignated document with Bates number BBG 12030 is a customer list. The same is true for the document with Bates numbers BBG 12089-12090.

10.34 The document with Bates numbers BBG 12172-12182 is a customer contract with specific sales information.

10.35 The documents with Bates numbers BBG 12500 and BBG 12501 contain business strategy information.

sensitive sales information about specific customers, including trade secrets. This information would allow NCIC to unfairly compete and interfere with these contracts. However, BBG is aware that it will need to undesignate certain contracts or portions of contracts for which it is seeking specific interference damages. As a result, BBG has undesignated certain property contracts or portions of contracts but the remainder must have AEO protection. Examples of property and/or carrier contracts or portions of contracts that have been undesignated include those with Bates numbers BBG 10251-10261, BBG 10628-10642, BBG 11632-11633 and BBG 11823-11831. For some documents, certain specific portions will need to remain AEO, which will be noted on the documents themselves as they will be produced to the court for its *in camera* review.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this \_\_\_\_\_\_ day of \_\_\_\_\_\_ at San Diego, California.

GREGORIO GALICOT

#### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing document was served upon all parties, via first class U.S. mail, on this \_\_\_\_\_\_ day of July, 2004, as follows:

Jerald R. Harper, Esq. Jerald R. Harper, PLC 504 Texas Street, Suite 405 Shreveport, LA 71101

Tom Henson, Esq. Ramey & Flock, P.C. 100 East Ferguson, Suite 500 Tyler, TX 75702 Telephone: 903/597-3301 Facsimile: 318/221-0008 Facsimile: 903/597-2413

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## **EXHIBIT A**

#### BBG COMMUNICATIONS V. NCIC, ET AL.

#### LOG OF UNDESIGNATED AEO DOCUMENTS

<u>Date</u>	No. of Pages	<u>Author(s)</u>	Recipient(s)	<u>Description</u>	AEO - Confidential	Bates No.
undated	13	Andrew Bridel	Joe DeClara	IHG Agreement Draft - Operator Services Agreement - Canopco Incorporated, BBG Communications, Inc. and Intercontinental Hotels Group	Highly Confidential and/or Trade Secret Competitive Information	BBG- 000014- 000026
undated	17	Penny Lee	Rebeca@bbgcom.com, Customer Service (cc)	Spreadsheet with new UK ANI's reflecting BBG internal business information	Highly Confidential and/or Trade Secret Competitive Information	BBG- 000030- 000046
undated	17	Penny Lee	Rebeca@bbgcom.com, Customer Service (cc)	Spreadsheet with new UK ANI's reflecting BBG internal business information	Highly Confidential and/or Trade Secret Competitive Information	BBG- 000068- 000084
undated	16	Penny Lee	Rebeca@bbgcom.com, Customer Service (cc)	Spreadsheet with new UK ANI's reflecting BBG internal business information	Highly Confidential and/or Trade Secret Competitive Information	BBG- 000104- 000119

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undated	8	Rafael Galicot	Tawnya, Orly Galicot	spreadsheet re BBG- Completed Collect Calls 20010720 reflecting BBG internal business information	Highly Confidential and/or Trade Secret Competitive Information	BBG- 000157- 000164
undated	7	Orly	rafael@bbgcomm.com	spreadsheet re BBG- Completed Collect Calls 20010730 reflecting BBG internal business information	Highly Confidential and/or Trade Secret Competitive Information	BBG- 000166- 000172
11/02/01	2	Gaston Luken Garza	Sr. Francisco Gutierrez	letter re Apreciable Francisco	Highly Confidential and/or Trade Secret Competitive Information	BBG- 000193- 000194
undated	13	Andrew Bridel	Gregorio, rafael@bbgcom.com (cc)	Operator Services Agreement - Canopco Incorporated, BBG Communications, Inc. and Intercontinental Hotel Group	Highly Confidential and/or Trade Secret Competitive Information	BBG- 000207- 000219
undated	13	Andrew Bridel	Joe DeClara	Operator Services Agreement - Canopco Incorporated, BBG Communications, Inc. and Intercontinental Hotel Group	Highly Confidential and/or Trade Secret Competitive Information	BBG- 000222- 000234

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undated	36	Ruben BBG	bcc@bbgcomm.com	spreadsheet monterey.xls reflecting BBG internal business information	Highly Confidential and/or Trade Secret Competitive Information	BBG- 000259- 000294
07/01/02	1	Sylvia Pena	Jeff	copy of billing for Intl Satellite Comm reflecting BBG internal business information	Highly Confidential and/or Trade Secret Competitive Information	BBG- 000302
undated	13	Ruben BBG	bcc@bbgcomm.com	MTY sin Comunicacion.xls spreadsheet in Spanish reflecting BBG internal business information	Highly Confidential and/or Trade Secret Competitive Information	BBG- 000306- 000318
05/08/03	1	Ricardo Macari	Lieda. Julieta Bejarano Hernandez	Letter in spanish reflecting BBG internal business information	Highly Confidential and/or Trade Secret Competitive Information	BBG- 000494
undated	3	Jaye	tanimara@prodigy.net.ms	Spreadsheet entitled Hoteles Occidental en Francia (Hotels in Western France) shows hotel name, number of rooms, address, telephone number and fax reflecting BBG/customer internal	Highly Confidential and/or Trade Secret Competitive Information	BBG- 000501- 000503

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				business information		
05/08/03	1	Ricardo Macari	Lieda. Julieta Bejarano Hernandez	Letter in Spanish reflecting BBG internal business information	Highly Confidential and/or Trade Secret Competitive Information	BBG- 000505
undated	4			spreadsheet with Location ANI column, address, city, province, and Implementation Type reflecting BBG internal business information	Highly Confidential and/or Trade Secret Competitive Information	BBG- 000508- 000511
undated	3			Spreadsheet entitled Hoteles Occidental en Francia (Hotels in Western France) shows hotel name, number of rooms, address, telephone number and fax reflecting BBG customer internal business information	Highly Confidential and/or Trade Secret Competitive Information	BBG- 000529- 000531
undated	2	Ruben BBG	bcc@bbgcomm.com	spreadsheet in spanish (BDAMPERS.xls) reflecting BBG internal business information	Highly Confidential and/or Trade Secret Competitive Information	BBG- 000593- 000594
05/05/03	1	Licda. Julieta Bejarano Hernandez	Rafael Galicot Levine	letter in Spanish reflecting BBG internal business information	Highly Confidential and/or Trade Secret	BBG- 000658

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					Competitive Information	
05/05/03	1	Licda. Julieta Bejarano Hernandez	Rafael Galicot Levine	letter in spanish reflecting BBG internal business information	Highly Confidential and/or Trade Secret Competitive Information	BBG- 000660
undated	10	Rafael Galicot	Tawnya	Contract sent by BBG Mexican Counsel for Grupo Allegro/Occidental - contract in spanish	Highly Confidential and/or Trade Secret Competitive Information	BBG- 000689- 000698
undated	3			Spreadsheet entitled Hoteles Occidental en Francia (Hotels in Western France) shows hotel name, number of rooms, address, telephone number and fax reflecting BBG customer business information	Highly Confidential and/or Trade Secret Competitive Information	BBG- 000712- 000714
		Ricardo (NO WAIVER OF ATTORNEY CLIENT PRIVILEGE)	Tawnya	bill for Monthly charges and hotel charges for calls	Highly Confidential and/or Trade Secret Competitive Information	BBG- 001366- 001367
		Jerry Gumpel (NO WAIVER OF ATTORNEY	Tawnya Wojciechowski	BBG Contract for Brazil with the Sheraton - BBG Holdings Limited and Cia	Highly Confidential and/or Trade	BBG- 001410-

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		CLIENT/WORK PRODUCT PRIVILEGE)		Palmares Hoteis E Turismo- Contrato	Secret Competitive Information	001425
01/24/03	1	Gregorio Galicot  (NO WAIVER OF ATTORNEY CLIENT/WORK PRODUCT PRIVILEGE)	Tawnya Wojciechowski	detail of bill for International Satellite - document entitled E-Bill through Quest Services	Highly Confidential and/or Trade Secret Competitive Information	BBG- 001538- 001540
04/12/02	16	Rafael Galicot	Tawnya	Contract (from Brazil with the Sheraton)	Highly Confidential and/or Trade Secret Competitive Information	BBG- 002128- 002143
	1	Franco, Miriam - Teleglobe	Gonzales, Gigi	ITFS Order Form – Carrier Market reflecting BBG internal business information	Highly Confidential and/or Trade Secret Competitive Information	BBG- 002326
	4	Lawrence Parker- USACELL Corp.	Elizabeth@BBGcom.com	Spreadsheet with columns detailing new Battery info	UN- DESIGNATED	BBG- 002394- 002397
	1			Sandals copy of calling card	Internal Information concerning customer hotel cards - undesignated	BBG- 002484

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	9	Andrew Bridel	Joe Declara	IHG Agreement – Draft Canopco Inc., BBG Communications, and Intercontinental Hotels Groups - Operator Services Agreement	Highly Confidential and/or Trade Secret Competitive Information	BBG- 002826- 002838
12/31/03	2	Gregorio Galicot	Delma Andrade	e-mail re Schiphol Tender – request for financial information or annual report reflecting BBG internal and customer business information	Highly Confidential and/or Trade Secret Competitive Information	BBG- 002956, 002957
12/31/03	1	Gregorio Galicot	Delma Andrade	e-mail re Schiphol tender – attaches an e-mail version of the tender with paper to follow reflecting BBG internal and customer business information	Highly Confidential and/or Trade Secret Competitive Information	BBG- 002958
03/21/03	12	Gregorio Galicot	Delma Andrade	Request For Proposal reflecting BBG internal and customer business information	Highly Confidential and/or Trade Secret Competitive Information	BBG- 002959- 002970
undated	25	W02-SD:8JE1\51300667.2		BBG Employee Handbook	Highly Confidential and/or Trade Secret Competitive Information	BBG- 002999- 003023

09/21/03	1	Ronald Perez	Gregorio Galicot	e-mail re Minuta Reunio Cancun Sep 18 2003 relating to BBG internal information	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003635
08/21/03	3	Gregorio Galicot	Ronald Perez	e-mail re BBG 214 License relating to BBG internal information	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003674- 003676
07/24/03	3	Ronald Perez	Gregorio Galicot, Jorge Macari Lopez (cc), bbgxico@aol.com (cc)	e-mail re NCIC St Lucia New Name and Ronald Perez's apparent termination of employment with NCIC	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003681- 003683
07/23/03	2	Ronald Perez	Gregorio Galicot	e-mail re Proyecto St. Kitts/Nevis relating to BBG internal information	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003684- 003685
Undated	2			Contact list for hotel St. Kitts and Nevis relating to BBG internal information	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003686- 003687

07/22/03	2	Gregorio Galicot	Ronald Perez	Contrato Chunghwa	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003688- 003689
^7/15/03	3	Ronald Perez	Gregorio Galicot	e-mail re CDR Purchase Proposal – re clarification on advertising and recommendation to advertise in Hotel rooms instead of on payphones relating to BBG internal information	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003690- 003692
07/11/03	3	Jorge Macari Lopez	Ronald Perez, Gregorio Galicot, Rafael Galicot (cc), cynthiao@bbgcomm.com (cc), bbgxico@aol.com (cc)	e-mail re Saludos & Estatus de Proyectos relating to BBG internal information	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003693- 003695
J7/11/03	2	Ronald Perez	Gregorio Galicot, Rafael Galicot (cc), cynthiao@bbgcomm.com (cc), bbgxico@aol.com (cc), Jorge Macari Lopez (cc)	e-mail re Saludos & Estatus de Proyectos relating to BBG internal information	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003696- 003697
07/01/03	1	Gregorio Galicot	Ronald Perez	e-mail re 0630 Chunghwa – ejemplo	Highly Confidential and/or Trade Secret Competitive	BBG- 003698

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					Information	
Undated	1			Instruction for Use	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003699
υ6/30/03	1	Gregorio Galicot	Ronald Perez, <u>bbgxico@aol.com</u> , Silvita  Zarate (cc)	e-mail re Contrato Aeropuerto Chile along with attachment	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003700
Undated	3	Gregorio Galicot	Ronald Perez, <u>bbgxico@aol.com</u> , Silvita  Zarate (cc)	Contrato de Arriendo	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003701- 003703
)6/27/03	2	Cynthia Osuna	Gregorio Galicot	e-mail re El Salvador Airport	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003704- 003705
10/31/02	1			Declaracion	Highly Confidential and/or Trade Secret Competitive	BBG- 003706

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:					Information	
06/27/03	1	Ronald Perez	Cynthia Osuna, Gabriela.villegas@bbgcom m.com (cc), Gregorio Galicot (cc)	e-mail re El Salvador Airport	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003707
Undated	1			Picture of phone ("Cambiar")	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003708
Undated	4			Advertisment in Spanish	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003709- 003712
)6/27/03	1	Ronald Perez (agent)		Work Order/Orden de Trabajo	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003713
06/27/03	1	Ronald Perez	bbgxico@aol.com, Gregorio Galicot (cc), tanimara@prodigy.net.mx (cc)	e-mail re Diseno Calca	Highly Confidential and/or Trade Secret Competitive	BBG- 003714

					Information	
Undated	2			Advertisment in Spanish	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003715- 003716
· 06/26/03	1	Ronald Perez	Gregorio Galicot	e-mail re Opom	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003717
06/26/03	1	Ronald Perez	Gregorio Galicot	e-mail re Telemovil El Salvador	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003718
)6/26/03	1	Cynthia Osuna	Gregorio Galicot	e-mail re Telefonos en Dominicana	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003719
06/25/03	1			Commercial Invoice	Highly Confidential and/or Trade Secret Competitive	BBG- 003720

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					Information	
06/19/03	6	gregorio@bbgcomm.com	rperez@telconetcorp.com	e-mail re Draft NCIC Agreement Telephones for DFPS along with draft	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003721- 003726
06/15/03	1	Ronald Perez	Gregorio Galicot	e-mail re Repulica Dominicana	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003727
06/14/03	2	Ronald Perez	Gregorio Galicot, cynthiao@bbgcomm.com (cc)	e-mail re El Salvador – Chile	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003728- 003729
J6/14/03	1	Ronald Perez	Gregorio Galicot	e-mail re BBG – St. Lucia side Letter – internal information to BBG	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003730
06/13/03	5	Gregorio Galicot	Ronald Perez	Letter re Primary Sales Agent Agreement/NCIC (St. Lucia) Inc.	Highly Confidential and/or Trade Secret Competitive	BBG- 003731- 003735

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					Information	
06/13/03	1	Gregorio Galicot	Jorge Macari, Ronald Perez (cc)	e-mail re BBG- St. Lucia side letter	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003736
06/13/03	5	Gregorio Galicot	Ronald Perez	Letter re Primary Sales Agent Agreement/NCIC (St. Lucia) Inc	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003737- 003741
06/13/03	1	Gregorio Galicot	Ronald Perez	e-mail re Contratos	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003742
J6/12/03	7	Telcell N.V. and NCIC St. Lucia Inc.		Operator Service Agreement	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003743- 003749
06/13/03	1	Gregorio Galicot	Ronald Perez	e-mail re BBG – St. Lucia side letter	Highly Confidential and/or Trade Secret Competitive	BBG- 003750

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					Information	
06/13/03	5	Gregorio Galicot	Ronald Perez	Letter re Primary Sales Agent Agreement/NCIC (St. Lucia) Inc	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003751- 003755
06/12/03	1	Ronald Perez	Gregorio Galicot	e-mail re Side letter St. Lucia	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003756
06/12/03	1	Gregorio Galicot	Ronald Perez, cynthiao@bbgcomm.com (cc)	e-mail re El Salvador Airport	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003757
J6/12/03	1	Ronald Perez	Francisco Lopez Stiles	Proposal Letter	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003758
06/09/03	1	Gregorio Galicot	Ronald Perez	e-mail re Sales Agreement internal information to BBG	Highly Confidential and/or Trade Secret Competitive	BBG- 003759

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					Information	
Undated	7			Sales Agent Agreement unsigned	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003760- 003766
06/09/03	1	Ronald Perez	Gregorio Galicot, <u>cynthiao@bbgcomm.com</u> (cc)	e-mail re Attachement que se "boto" – contrato internal information to BBG	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003767
06/08/03	1	gregorio@bbgcomm.com	rperez@telconetcorp.com, cynthiao@bbgcomm.com, gregorio@bbgcomm.com (cc)	e-mail re Attachment que se "boto" – contrato – internal information to BBG	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003768
Undated	4			Sales Location Agreement	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003769- 003772
06/12/03	3	Gregorio Galicot	Ronald Perez	e-mail re NCIC Operator Service Proposal	Highly Confidential and/or Trade Secret Competitive	BBG- 003773- 003775

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					Information	
02/13/02	2	Jack Maizel, Investor Relations		BBG Communications, Inc. Press Release - Draft	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003776- 003777
06/27/03	1	Ronald Perez	tanimara@prodigy.net.mx, Gregorio Galicot (cc), bbgxico@aol.com (cc)	e-mail re Cabinas Proyecto Puerto de Cruceros St. Lucia	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003778
Undated	2			Photos of phone with Dimensiones	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003779- 003780
06/17/03	5	Rperez	gregorio@bbgcomm.com	e-mail re Telcell St. Marteen	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003781- 003785
06/15/03	1	gregorio@bbgcomm.com	rperez@telconetcorp.com, gregorio@bbgcomm.com (cc)	e-mail re To Do!!	Highly Confidential and/or Trade Secret Competitive	BBG- 003786

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					Information	
06/15/03	2	Ronald Perez	Gregorio Galicot, cynthiao@bbgcomm.com (cc)	e-mail re Inventario de Cuentas	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003787- 003788
Undated	1			Indoor Enclosures (MC- 101) describes dimensions of new unit	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003789
06/09/03	1	Ronald Perez	Gregorio Galicot, cynthiao@bbgcomm.com (cc)	e-mail re Projectos	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003790
Undated	1			Picture of phone with Call Home sign above	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003791
Undated	1			Advertisement "collect calls" "871"	Highly Confidential and/or Trade Secret Competitive	BBG- 003792

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· · · · · · · · · · · · · · · · · · ·					Information	
Undated				Plan de Accion Junio/Tiempos/Responsable s	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003793- 003795
12/22/03	1	Julie Dunne	Tawnya Wojciechowski, Jerry Gumpel (cc)	e-mail re 51300667_2.doc – Employee handbook	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003796
Undated	25			BBG Communications – Employee Handbook SD:8JE1\51300667.2	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003797- 003821
12/31/03	1	Gregorio Galicot	Delma Andrade	e-mail re Servicios NCIC regarding internal BBG information	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003822
08/06/03	1	rperez@telconetcorp.com	gregorio@bbgcomm.com, tanimara@prodigy.net.mx	e-mail re representing yourself as NCIC- stop stating that you are NCIC	Highly Confidential and/or Trade Secret Competitive	BBG- 003823

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					Information	
07/04/03	1	Ronald Perez	Gregorio Galicot	e-mail re Why you want to talk to me – re Jeffrey Walters requesting information back from Ronald such as contracts, equipment, stickers	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003824
06/30/03	1	Ronald Perez	Gregorio Galicot	e-mail re Services – from Jeffrey Walters to Ronald asking for contracts Ronald signed in the name of NCIC	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003825
10/08/03	3	Ronald Perez	tanimara@prodigy.net.mx, Gregorio Galicot (cc)	e-mail re St Lucia Status	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003826- 003828
09/17/03	1		Kirk Skeete, Gregorio Galicot (cc)	e-mail re Revised Proposal for St Lucia	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003829
12/31/03	7	Mallik Penamatsa	Kirk Skeete, Gregorio Galicot (cc)	Telconet St. Lucia "Incremental Revenues at Zero Cost" Proposal to C&W, St. Lucia	Highly Confidential and/or Trade Secret Competitive	BBG- 003830- 003836

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					Information	
09/17/03	4	Ronald Perez	Gregorio Galicot, Jorge Macari, <u>bbgxico@aol.com</u>	e-mail re Revised Proposal for St. Lucia	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003837- 003840
12/31/03	7	Telconet St. Lucia		"Incremental Revenues at Zero Cost" Proposal to C&W, St. Lucia	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003841- 003847
09/17/03	7	Telconet St. Lucia		"Incremental Revenues at Zero Cost" Proposal to C&W, St. Lucia	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003848- 003854
09/17/03	4	Gregorio Galicot	Ronald Perez, Jorge Macari, <u>bbgxico@aol.com</u>	e-mail re Revised Proposal for St Lucia	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003855- 003858
09/16/03	3	Gregorio Galicot	Ronald Perez, Jorge Macari, Xico Rivera	e-mail re Hotel Project and discusses Hospitality Operator Services PBX programming request	Highly Confidential and/or Trade Secret Competitive	BBG- 003859- 003861

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					Information	
09/16/03	3	Mallik Penamatsa	Skeet, Kirk, Gregorio Galicot (cc)`	e-mail re Hotel Project and discusses Hospitality Operator Services PBX programming request	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003862- 003864
09/16/03	3	Ronald Perez	Gregorio Galicot, Jorge Macari Lopez (cc), BBGXICO@aol.com (cc)	e-mail re Hotel Project and discusses Hospitality Operator Services PBX programming request	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003865- 003867
08/27/03	3	Gregorio Galicot	rperez, bbgxico@aol.com (cc), tanimara@prodigy.net.mx (cc)	e-mail re 0826 C&W Conference	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003868- 003870
Undated	5			Proposal of Operator Service to the Hotel Industry of St. Lucia W.I By Telconet St. Lucia/BBG Communications	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003871- 003875
07/07/03	1	Jorge Macari Lopez	Gregorio Galicot, Ronald Perez (cc)	e-mail re NCIC St Lucia Ronald Perez requesting change in name from NCIC St. Lucia to a new name	Highly Confidential and/or Trade Secret Competitive	BBG- 003876

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					Information	
07/04/03	1	Ronald Perez	fosterpi@candw.lc, Jorge Macari Lopez (cc), Gregorio Galicot (cc)	e-mail re NCIC St Lucia Ronald Perez requesting change in name from NCIC St. Lucia to a new name	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003877
06/15/03	1	Ronald Perez	cynthiao@bbgcomm.com, Gregorio Galicot	e-mail re Hotel en St Lucia	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003878
05/28/03	1	pmauchant@pacific.net.sg	gregorio@bbgcomm.com, stomps@candw.ky	e-mail re contract – attaches signed parts of the contracts	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003879
05/28/03	3 (page 1, 10, 12)	BBG Holdings Limited and Patrick Mauchant		Sales Representative Agreement	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003880- 003882
undated	1			Certificate of Foreign Status	Highly Confidential and/or Trade Secret Competitive	BBG- 003883

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					Information	
08/18/03	1	Gregorio Galicot	patrick	e-mail re NCIC agent change	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003884
08/18/03	1	Gregorio Galicot	pmauchant@pacific.net.sg, michael.stomps@bbcomm. com, Michael Stomps, (cc) cynthiao@bbgcomm.com (cc)	e-mail re NCIC agent change	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003885
08/03/03	1	gregorio@bbgcomm.com	igumpel@smrh.com, tawnya@sheppardmullin.c om, rafael@bbgcomm.com (cc), gregorio@bbgcomm.com (cc)	redacted e-mail re swissotel saga update- NCIC not having a license to work or service hotels in Singapore	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003886
08/18/03	2	pmauchant@pacific.net.sg	gregorio galicot, michael stomps@bbgcomm.com, damonr@vozbgg.com	e-mail re NCIC agent change	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003887- 003888
08/18/03	2	Gregorio Galicot	patrick	e-mail re agent change	Highly Confidential and/or Trade Secret Competitive	BBG- 003889- 003890

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					Information	
06/19/03	1	Steven Levine	Gregorio Galicot	e-mail re agreement – attaches Traffic Agreement and Sales Rep Agreement	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003911
06/18/03	1	Gregorio Galicot	Steve Levine	e-mail re agreement – attaches Traffic Agreement and Sales Rep Agreement	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003912
undated, 2003	16	BBG Holdings Limited and Mission Communications		Primary Sales Agreement	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003913- 003928
undated, 2003	12	BBG Holdings, Ltd. and Mission Communications, Steve Levine and Michael Vogel (collectively)	·	Traffic Agreement	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003929- 003940
06/03/03	3	gregorio@bbgcomm.com	slevine@missioncomm.net, gregorio@bbgcomm.com, brianr@bbgcomm.com	e-mail re Mission Exploratory requesting financial aspects and deal points for an agreement	Highly Confidential and/or Trade Secret Competitive	BBG- 003941- 003943

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					Information	
05/29/03	1	Steven Levine	Gregorio Galicot	e-mail re Mission Exploratory	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003944
05/26/03	1	Steven Levine	Gregorio Galicot	e-mail re Mission Exploratory	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003945
undated	3	Steven Levine	Gregorio Galicot	General Outline for Cooperation – general outline for possibly working together and growing the business	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003946- 003948
05/23/03	1	slevine@missioncomm.com	gregorio@bbgcomm.com, mvogel@missioncomm.net , slevine@missioncomm.net, brianr@bbgcomm.com	e-mail re BBG – Mission (possible cooperation)	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003949
05/22/03	1	Gregorio Galicot	Mike Vogel, Steve Levine	e-mail re BBG- Mission (Possible cooperation between companies)	Highly Confidential and/or Trade Secret Competitive	BBG- 003950

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					Information	
11/07/01	1	salvador Iombroso	Gregorio Galicot	e-mail re Contracts Levine in Spanish shows commission info	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003952
undated	12	salvador Iombroso	Gregorio Galicot	Sales Representative Agreement	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003953- 003964
10/22/01	1	salvador Iombroso	Gregorio Galicot	e-mail re ITFS list.xls — communication between Steven Levine and Salvador Lombroso re "moving on PTT Deal"	Highly Confidential and/or Trade Secret Competitive Information	BBG- 003965
J5/15/03	11	BBG Holdings, Ltd and Benchmark Project Management, s.r.o. Michel Alexiev and Goran Alexiev		Traffic Agreement	Highly Confidential and/or Trade Secret Competitive Information	BBG- 004072- 004082
01/14/97	5	State of California		Certificate of Qualification, Statement by Foreign Corporation, Certificate of Incorporation, Certificate of Amendment of Certificate of Incorporation, Certificate of	Highly Confidential and/or Trade Secret Competitive	BBG- 004137- 004141

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			Incumbency	Information	
05/05/03	3	VOZBBG Communications Pte. Ltd. and BBG Communications	Subcontractor Agreement	Highly Confidential and/or Trade Secret Competitive Information	BBG- 004142- 004144
07/16/03	5	BBG Holdings Ltd. and Francis Lobo	Nondisclosure and Non- Compete Agreement	Highly Confidential and/or Trade Secret Competitive Information	BBG- 004203- 4207
05/15/03	11	BBG Holdings, Ltd. and Michael Stomps	Traffic Agreement	Highly Confidential and/or Trade Secret Competitive Information	BBG- 004240- 004250
J9/09/03	16	NCIC (Bahamas) Limited and One World Communications Limited	Assignment and Assumption Agreement	Highly Confidential and/or Trade Secret Competitive Information	BBG- 004251- 004266
09/03	21	NCIC (Bahamas) Limited and BBG Holdings Ltd.	Traffic Agreement	Highly Confidential and/or Trade Secret Competitive	BBG- 004267- 004287

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					Information	
05/15/03	11	BBG Holdings Ltd. and Michael Stomps		Traffic Agreement	Highly Confidential and/or Trade Secret Competitive Information	BBG- 004304- 4314
05/15/03	11	BBG Holdings Ltd. and Michel Alexiev and Goran Alexiev		Traffic Agreement	Highly Confidential and/or Trade Secret Competitive Information	BBG- 004315- 004325
07/17/02	3	Pinto, Jose	Alfred Clemesha	e-mail re viaje Miami BBG regarding internal BBG information	Highly Confidential and/or Trade Secret Competitive Information	BBG- 04833- 04835
10/21/03	1	BBG Holdings, LTD		Checks for Angel Leon and Wyndham Beach Resort and Casino	Highly Confidential and/or Trade Secret Competitive Information	BBG- 04859
10/13/03	2	BBG Holdings, Ltd.	Aruba Hotel Enterprises N.V.	letter re credit card/pay phone services from premises	Highly Confidential and/or Trade Secret Competitive	BBG- 04860- 04861

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					Information	
10/13/03	6	BBG Holdings Limited and Aruba Hotel Enterprises N.V.		Telecommunications Services Agreement	Highly Confidential and/or Trade Secret Competitive Information	BBG- 04862- 04867
10/13/03	2	BBG Holdings Limited and Angel Alfonso Leon Macas		Addendum to Sales Representative Agreement	Highly Confidential and/or Trade Secret Competitive Information	BBG- 04868- 04869
12/14/02	1	Alfonso Riveroll, Rob Smith	Sincopr. Enterprises, Attn. Ricardo Singer	Termination Letter	Highly Confidential and/or Trade Secret Competitive Information	BBG- 04870
J5/25/02	13	BBG Bermuda (Holdings) LTD. and Angel Alfonso Leon Macas		Sales Representative Agreement	Highly Confidential and/or Trade Secret Competitive Information	BBG- 04871- 04883
05/26/02	5	Sincorp Enterprises and Wyndham Aruba Beach Resort & Casino Enterprises N.V.		Telecommunications Services Agreement	Highly Confidential and/or Trade Secret Competitive	BBG- 04884- 04888

					Information	
11/03	14	BBG Communications, Inc. and Telekom Austria AG	·	Operator Service Agreement	Highly Confidential and/or Trade Secret Competitive Information	BBG- 04889- 04902
	10	BBG Communications, LTD		operator Services Agreement	Highly Confidential and/or Trade Secret Competitive Information	BBG- 04910- 04919
	5	OTEGlobe and BBG Holdings Limited		Contract for Collect & Credit Card Services of BBG on OTEGlobe Payphones location throughout the Greek Territory	Highly Confidential and/or Trade Secret Competitive Information	BBG- 04921- 04925
J7/07/03	4	Gregorio Galicot	John Markakis, ddd (cc), pedro cordova monroy (cc) Ricardo Singer (cc)	e-mail re BBG- OTE concerning internal BBG and custome information	Highly Confidential and/or Trade Secret Competitive Information	BBG- 04926- 04929
07/17/03	2	BBG Grecia S.A. Telecommunication Services		Minutes of the No 3 Meeting of the Board of Directors of the Company	Highly Confidential and/or Trade Secret Competitive	BBG- 04933- 04934

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					Information	
	5	BBG Holdings Limited and OTEGlobe		Contract for Collect & Credit Card Services of BBG on OTEGlobe Payphones location throughout the Greek Territory	Highly Confidential and/or Trade Secret Competitive Information	BBG- 04935- 04939
2003	10	BBG Holdings Limited and Chungwa Telecom International Business Group		Operator Services Agreement	Highly Confidential and/or Trade Secret Competitive Information	BBG- 06752- 06761
11/15/03	2	Mail4TFD	Mail4DLR, Mail4LLR (cc), rafael@bbgcomm.com (cc), slombrozo@bbgcomm.com (cc), Mail4MNR (cc)	e-mail re Commission Allegro Aruba Resort and Casino	Highly Confidential and/or Trade Secret Competitive Information	BBG- 07054- 07055
03/16/04	1	Gregorio Galicot	Damages Administrator	e-mail re Telekom Austrial/BBG minutes & agreement	Highly Confidential and/or Trade Secret Competitive Information	BBG- 07056
11/21/02	9	BBG Communications, LTD and Telekom Austria		Operator Services Agreement	Highly Confidential and/or Trade Secret Competitive	BBG- 07057- 07065

					Information	
11/21/03	2	William J. La Monaca	Chris-Maria Baumer, Ing. Gunther Steck	letter re Minutes to Meeting November 21, 2003	Highly Confidential and/or Trade Secret Competitive Information	BBG- 07066- 07067
11/21/03	2	William J. La Monaca	Chris-Maria Baumer, Ing. Gunther Steck	letter re Minutes to Meeting November 21, 2003	Highly Confidential and/or Trade Secret Competitive Information	BBG- 07192- 07193
11/15/03	2	Mail4TFD	Mail4DLR, Mail4LLR (cc), rafael@bbgcomm.com (cc), slombrozo@bbgcomm.com (cc), Mail4MNR (cc)	e-mail re Commission Allegro Aruba Resort and Casino	Highly Confidential and/or Trade Secret Competitive Information	BBG- 07194- 07195
J7/17/03	4	OTE S.S. and BBG Grecia, S.A.		Pilot Agreement	Highly Confidential and/or Trade Secret Competitive Information	BBG- 07244- 07247
03/02/03	4	Elio Iadevaia – Telecom Italia	BBG Communications, Inc.	Letter in foreign language regarding dealings with Telecom Italia	Highly Confidential and/or Trade Secret Competitive	BBG- 07248- 07251

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					Information	
09/24/02	2	bbgcommunication42@earthlink.net	gregorio@bbgcomm.com	e-mail re internal BBG information	Highly Confidential and/or Trade Secret Competitive Information	BBG- 07419- 07420
09/24/02	1	bbgcommunication42@earthlink.net	gregorio@bbgcomm.com	e-mail re internal BBG Information	Highly Confidential and/or Trade Secret Competitive Information	BBG- 07421
09/24/02	1	Robert Elsinga	Gregorio Galicot, Ricardo Singer, Sunil Khatnani (cc)	e-mail re Collect Services for customer	Highly Confidential and/or Trade Secret Competitive Information	BBG- 07422
J6/10/02	1	D. Andrade	Gregorio Galicot	e-mail re competencia NCIC Club Med Cancun robo de llamadas	Highly Confidential and/or Trade Secret Competitive Information	BBG- 07424
03/08/04	3	Mail4TFD@aol.com	Rafael Galicot,  Mail4DLR@aol.com (cc), gregorio galicot (cc)	e-mail re correspondence with Holiday In Aruba – Rafael request	Highly Confidential and/or Trade Secret Competitive	BBG- 07425- 07427

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					Information	
11/03/03	2	Jorge Marcari Lopez	Rafael Galicot, Silvia Zarate	e-mail reAni Delivery	Highly Confidential and/or Trade Secret Competitive Information	BBG- 07430- 07431
06/20/03	2	Ricardo Singer	Rafael Galicot	e-mail re calls under 3 minutes OTRO Mail	Highly Confidential and/or Trade Secret Competitive Information	BBG- 07432- 07433
06/20/03	3	Ricardo Singer	Rafael Galicot	e-mail re Collect Calls Proposal	Highly Confidential and/or Trade Secret Competitive Information	BBG- 07436- 07438
01/01/99	11	BBG Bermuda (Holdings), LTD and Francisco Javier Algorri Diaz		Sales Represenative Agreement	Highly Confidential and/or Trade Secret Competitive Information	BBG- 07463- 07473
05/17/04	3	damonrhys@vozbbg.com	Gregorio Galicot	e-mail re VOZBBG/Starhub Agreement	Highly Confidential and/or Trade Secret Competitive	BBG- 07488- 07490

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					Information	
05/17/04	2	damonrhys@vozbbg.com	Gregorio Galicot	e-mail re Starhub Letter of REcommendation for VOZ/BBG	Highly Confidential and/or Trade Secret Competitive Information	BBG- 07491- 07492
√5/17/04	1	damonrhys@vozbbg.com	Gregorio Galicot	e-mail re Starhub Letter of REcommendation for VOZ/BBG	Highly Confidential and/or Trade Secret Competitive Information	BBG- 07493
05/17/04	2	damonrhys@vozbbg.com	Gregorio Galicot	e-mail re VOZBBG/Starhub Agreement	Highly Confidential and/or Trade Secret Competitive Information	BBG- 07494- 07495
,2/05/03	1	Cynthia Osuna	Gregorio Galicot	e-mail re Emailing Services (Web Page BTL's Belize)	Highly Confidential and/or Trade Secret Competitive Information	BBG- 07546
02/27/03	2	Cynthia Osuna	Gregorio Galicot	e-mail re Info que saque de la pagina de BTL (MCI es su proveedor de Collect)	Highly Confidential and/or Trade Secret Competitive	BBG- 07547- 07548

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					Information	
04/07/03	2	Cynthia Osuna	Darlene Coye	e-mail re Hi Darlene concerning BBG internal information	Highly Confidential and/or Trade Secret Competitive Information	BBG- 07558- 07559
	3	BTL		Proposal for Information Exchange Agreement	Highly Confidential and/or Trade Secret Competitive Information	BBG- 07560- 07562
07/10/03	4	Martin Aldana	Jorge Macari Lopez	e-mail re internal BBG information	Highly Confidential and/or Trade Secret Competitive Information	BBG- 07563- 07566
)5/04/04	2	Cynthia Osuna	Jorge Macari Lopez	e-mail re Desing Belize (Cotizacion) concerning internal BBG and customer information	Highly Confidential and/or Trade Secret Competitive Information	BBG- 07567- 07568
05/04/04	1	Cynthia Osuna	Jorge Macari Lopez, Rafael Galicot (cc)	e-mail re Desing Belize (Cotizacion) concerning internal BBG and customer information	Highly Confidential and/or Trade Secret Competitive	BBG- 07569

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					Information	
05/23/03	2	Jorge Macari Lopez	Karen Bevans, Gregorio Galicot (cc)	e-mail re BTL- BBG concerning internal BBG information	Highly Confidential and/or Trade Secret Competitive Information	BBG- 07570- 07571
07/01/03	2	Martin Aldana	Jorge Macari Lopez, Karen Bevans (cc)	e-mail concerning internal BBG information	Highly Confidential and/or Trade Secret Competitive Information	BBG- 07572- 07573
07/01/03	2	Martin Aldana	Jorge Macari Lopez, Karen Bevans (cc)	e-mail concerning internal BBG information	Highly Confidential and/or Trade Secret Competitive Information	BBG- 07574- 07575
J8/20/03	1	Karen Bevans	Jorge Macari Lopez	e-mail concerning internal BBG information	Highly Confidential and/or Trade Secret Competitive Information	BBG- 07576
07/24/03	3	Karen Bevans	Martin Aldana, Jorge Macari Lopez	e-mail concerning internal BBG information	Highly Confidential and/or Trade Secret Competitive	BBG- 07577- 07579

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					Information	
07/17/03	1	Martin Aldana	Jorge Macari Lopez	e-mail concerning internal BBG information	Highly Confidential and/or Trade Secret Competitive Information	BBG- 07580
U7/17/03	2	Martin Aldana	Jorge Macari Lopez	e-mail concerning internal BBG information	Highly Confidential and/or Trade Secret Competitive Information	BBG- 07581- 07582
05/03/04	4	Cynthia Osuna	Jorge Macari Lopez	e-mail re Diseno Target concerning internal BBG information	Highly Confidential and/or Trade Secret Competitive Information	BBG- 07583- 07586
)8/07/03	1	Karen Bevans	Jorge Macari Lopez	e-mail re Visit to Cancun concerning internal BBG information	Highly Confidential and/or Trade Secret Competitive Information	BBG- 07587
07/17/03	1	Jorge Macari Lopez	Martin Aldana	e-mail concerning internal BBG information	Highly Confidential and/or Trade Secret Competitive	BBG- 07588

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					Information	
07/10/03	1	Jorge Macari Lopez	Martin Aldana	e-mail concerning internal BBG information	Highly Confidential and/or Trade Secret Competitive Information	BBG- 07589
U8/04/03	3	Jorge Macari Lopez	Martin Aldana, Karen Bevans (cc)	e-mail concerning internal BBG information	Highly Confidential and/or Trade Secret Competitive Information	BBG- 7590- 07592
05/03/04	3	Cynthia Osuna	Jorge Macari Lopez	e-mail re Diseno Tarjet concerning internal BBG information	Highly Confidential and/or Trade Secret Competitive Information	BBG- 07593- 07595
)4/30/04	2	Cynthia Osuna	Jorge Macari Lopez, Rafael Galicot	e-mail re Diseno Tarjet concerning internal BBG information	Highly Confidential and/or Trade Secret Competitive Information	BBG- 07596- 07597
04/30/04	2	Cynthia Osuna	Jorge Macari Lopez	e-mail re Diseno Tarjet concerning internal BBG information	Highly Confidential and/or Trade Secret Competitive	BBG- 07598- 07599

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					Information	
04/30/04	2	Cynthia Osuna	Jorge Macari Lopez	e-mail re Diseno Tarjet concerning internal BBG information	Highly Confidential and/or Trade Secret Competitive Information	BBG- 07600- 07501
05/16/03	1	Cynthia Osuna	Gregorio Galicot	e-mail re BBG Proposal to Belize for HCD & Billing 02-26/03	Highly Confidential and/or Trade Secret Competitive Information	BBG- 07602
07/24/03	3	Jorge Macari Lopez	Karen Bevans	e-mail concerning internal BBG information	Highly Confidential and/or Trade Secret Competitive Information	BBG- 07611- 07613
)7/01/03	2	Jorge Macari Lopez	Martin Aldana, Karen Bevans (cc)	e-mail concerning internal BBG information	Highly Confidential and/or Trade Secret Competitive Information	BBG- 07614- 07615
07/25/03	4	Jorge Macari Lopez	Karen Bevans	e-mail concerning internal BBG information	Highly Confidential and/or Trade Secret Competitive	BBG- 07616- 07619

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					Information	
05/23/03	2	Jorge Macari Lopez	Karen Bevans, Gregorio Galicot (cc)	e-mail re BTL – BBG concerning internal BBG information	Highly Confidential and/or Trade Secret Competitive Information	BBG- 07620- 07621
05/26/03	3	Jorge Macari Lopez	Karen Bevans	e-mail re BTL – BBG concerning internal BBG information	Highly Confidential and/or Trade Secret Competitive Information	BBG- 07622- 07624
05/27/03	3	Jorge Macari Lopez	Karen Bevans	e-mail re BTL- BBG concerning internal BBG information	Highly Confidential and/or Trade Secret Competitive Information	BBG- 07625- 07627
J8/20/03	2	Jorge Macari Lopez	Karen Bevans	e-mail concerning internal BBG information	Highly Confidential and/or Trade Secret Competitive Information	BBG- 07628- 07629
02/05/03	2	Gregorio Galicot	Cynthia Osuna	e-mail re Nuevo Contacto Cobro Revertido concerning internal BBG and customer information	Highly Confidential and/or Trade Secret Competitive	BBG- 07630- 07631

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<u> </u>					Information	
11/15/02	3	silviaz@bbgcomm.com  (NO WAIVER OF ATTORNEY CLIENT PRIVILEGE)	ebalfour@sheppardmullin. com	e-mail re Ronald/Telco	Highly Confidential and/or Trade Secret Competitive Information	BBG- 10085- 10087
05/01/02	1	Ronald Perez	Rafael Meraz, manuel@bbgcomm.com (cc)	e-mail re BBG Phones in Venezuela regarding BBG pre-existing business	Highly Confidential and/or Trade Secret Competitive Information	BBG- 10088
05/23/02	2	Ronald Perez	Manuel Alvarez	e-mail re telefonos costarica regarding BBG pre-existing business	Highly Confidential and/or Trade Secret Competitive Information	BBG- 10089- 10090
J5/28/02	2	Ronald Perez	Manuel Alvarez, Cynthia Govea (cc)	e-mail re telefonos costarica regarding BBG pre-existing business	Highly Confidential and/or Trade Secret Competitive Information	BBG- 10091- 10092
06/01/02	4	Ronald Perez	manuel@bbgcomm.com	e-mail re telefonos costarica regarding BBG pre-existing business	Highly Confidential and/or Trade Secret Competitive	BBG- 10093- 10096

				Information	
05/26/02	5	Sincorp Enterprises and Wyndham Aruba Beach Resort & Casino Enterprises N.V.	Telecommunications Services Agreement	Highly Confidential and/or Trade Secret Competitive Information	BBG- 10127- 10131
1/01/01	10	BBG Communications, Inc. and Hospitality Telecommunications of California, Inc.	Sales Representative Agreement	Highly Confidential and/or Trade Secret Competitive Information	BBG- 11960- 11969
03/29/01	13	BBG Holdings (Bermuda), Inc. and Global Link Inc., Global Link Telecommunications N.V., and Ricardo Singer Castro	Sales Representative Agreement	Highly Confidential and/or Trade Secret Competitive Information	BBG- 11970- 11982
)3/10/98  -	9	BBG Communications, Inc. and Global Link 2000	Sales Representative Agreement	Highly Confidential and/or Trade Secret Competitive Information	BBG- 11983- 11991
04/01/98	10	BBG Communications, Inc. and Glencross Holdings	Sales Representative Agreement	Highly Confidential and/or Trade Secret Competitive	BBG- 11992- 12001